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Date: Saturday - September 18, 2010 4:42 PM  
Subject: Re: BMP-Based Approach - Alternative Approach

Please find the attached straw proposal concerning Option 4.

This would achieve your objectives of a target created independent of actual performance, and a reasonable belief that if every retail water agency used this approach, the state would reduce GPCD 20% from the baseline.

We believe a major benefit of this proposal is that it will be fairly simple for water agencies to calculate their 2015 and 2020 targets, yet it is robust enough to accommodate major differences between water agencies without inducing significant distortions or swings in the target estimates.

The major shortcoming of this proposal, from our perspective, is that it does not promote the implementation of the CUWCC BMPs to the extent our original proposal did; promoting the CUWCC BMPs was one of the stated legislative intents of SBx7-7 and, we believe, in the best interest of the State of California.

That being said, this would be the only proposal (or existing Option) which actively involves the CUWCC, creating the necessary linkage between SBx7-7 and the legislative intent that does not currently exist.

We think this proposal achieves the other objectives as well, such as recognition for past investments in conservation, recognizing important differences between water agencies, provides flexibility, etc.

This model was created by Ron, Fiona and me; I last received their input this morning; but, in the interest of time, I am sending this to the group; Fiona and Ron will let you know which parts, if any, they wish to modify.

We would appreciate your consideration of this proposal.

If you would like a slide presentation and/or an example of how it would work, we would be happy to provide them. Just let us know.

Thank you for conserving water  
(fax: 562.499.1025)

**DRAFT**  
**SBx7-7 Option 4 Approach:**  
**Modified BMP-Compliance**

Using this approach a water agency would NOT be in compliance with SBx7-7 simply because it was in compliance with the BMPs.

Using this approach, a water agency would calculate its 2015 and 2020 targets based on the expected water savings were it to fully implementation of the Programmatic BMPs, reduce system losses to 40 gallons/ connection/ day, and achieve additional conservation as specified below. This additional conservation may come from full implementation of the Foundational BMPs and/or code changes and/or other sources.

This approach only describes how the target is calculated, it does not dictate how a water agency reaches its 2015 and 2020 targets; for example, this approach does not require a water agency to fully implement the Programmatic BMPs.

**How a Water Agency Calculates Its 2020 Targets**

A water agency would calculate its 2020 GPCD Target in the following way:

- + Add: the water agency's 1995-2005 Baseline GPCD
- Subtract: the expected water saving by 2020 from full implementation of the Programmatic BMP

*A water agency estimates this number by using the CUWCC calculation of its expected water savings from full implementing the Programmatic BMPs; then converting it into GPCD*

- Subtract: the expected water savings from reducing System Losses

*A water agency calculates this number by taking the difference between its average system losses during the 1995-2005 baseline period (in gallons per connection per day) and 40 gallons per connection per day; then converts this to GPCD.*

- Subtract: "Agency's Additional Conservation"

*Where "Agency's Additional Conservation" = (the water agency's Baseline GPCD) x's (Statewide % Additional Conservation)*

*See below for how the "Statewide % Additional Conservation" is calculated.*

*This additional conservation would likely come from sources such as full implementation of the Foundational BMPs, from code and/or other sources.*

**Calculating "Statewide % Additional Conservation"**

"Statewide % Additional Conservation" is a single number used by all water agencies using this option. It is the amount of GPCD reduction, expressed as a percent of the

statewide 1995-2005 Baseline GPCD, needed in addition to the water savings from the Programmatic BMPs and System Loss reduction in order for the state to achieve a 20% reduction by 2020.

"Statewide % Additional Conservation" will be calculated by DWR, working in cooperation with U4 Committee, in the following way:

First: calculate the Statewide Additional Conservation:

$$+ 38 \text{ GPCD } (192 \text{ GPCD} \times 20\%)$$

- Subtract: the expected water savings statewide if all urban retail water agencies fully implementing the Programmatic BMPs (from 1995-2005 baseline GPCD); expressed in GPCD.

- Subtract: the expected water savings statewide from all urban retail water agencies reducing system losses to 40 gallons/ day/ connection (from 1995-2005 Baseline GPCD); expressed in GPCD.

= Equals: the Statewide Additional Conservation, in GPCD

Second: calculate the **Statewide % Additional Conservation** by converting this number into a percent of the baseline GPCD:

$$= (\text{Statewide Additional Conservation} / 192 \text{ GPCD})$$

### **In 2015 and 2020**

The 2015 target would be calculated in much the same way, seeking the 10% reduction by 2015 from the baseline.

The water agency's Target can be revised based on actual conditions in 2015 and 2020: CUWCC will recalculate the water agency's expected water savings from implementing the Programmatic BMPs. In 2015 and 2020 the water agency shall compare its actual GPCD to its Target to determine compliance with SBx7-7.